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September 17, 2015

Via Facsimile (212-805-6111) and
Via ECF

The Honorable Henry B. Pitman
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

APPLICATION GRANTED

SO ORDERED

Henry Pitman
HENRY PITMAN
UNITED STATES MAGISTRATE JUDGE
9-18-15

Re: *Laydon v. Mizuho Bank, Ltd. et al.*, No. 1:12-cv-03419-GBD
Request for Extension on Reply Briefing Deadline

Dear Judge Pitman:

We represent the HSBC Defendants in the above-referenced action and write on behalf of all parties. Certain Defendants filed motions to sustain their data privacy law objections under the laws of the United Kingdom on August 6, 2015, along with affidavits of certain experts in support.¹ See ECF Nos. 495, 501. Plaintiff's served requests to depose Defendants' U.K. data privacy law experts. Defendants objected and served a pre-motion letter with the Court, to which the Plaintiff responded. See ECF Nos. 506, 507. The parties wish to inform the Court that based on discussions with the parties, the Plaintiff has now agreed to withdraw his deposition notices, subject to renewal after Plaintiff has had an opportunity to review Defendants' reply. In addition, the Defendants respectfully request a two-day extension from Monday, September 21 to Wednesday, September 23 by which to file their reply on the motion to sustain the data privacy law objections under the laws of the United Kingdom. This is Defendants' first request and Plaintiff consents.

We thank the Court for its attention to this matter.

Respectfully submitted,

Gregory T. Casamento

Gregory T. Casamento

Counsel for HSBC Defendants

cc: All Counsel of Record (by email)

¹ As the Court is aware, the parties have also reached an agreement on how to address certain Defendants' discovery objections under the data privacy laws of Japan. See ECF No. 511.